



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

DRAFT

Reply To

Attn Of: OCE-084, Suite 900

Mr. Darrick Cope, Superintendent
Helix School District No. 1-R
P.O. Box 398
Helix, Oregon 97835

Re: PCB Remediation Plan Approval

Dear Mr. Cope:

The Environmental Protection Agency, Region 10 (EPA) has reviewed the July 20, 2009, Helix School District 1-R, Remediation Plan Polychlorinated Bi-Phenyl (PCB) sampling, cleanup, and removal of PCB contamination which resulted from releases of Toxic Substances Control Act (TSCA) regulated PCBs at the Helix School District schools, in Helix, Oregon.

The EPA understands that the Ione School District will complete the PCB Remediation at the Helix School in accordance with 40 CFR § 761.61(a). The EPA concurs with and approves this PCB Remediation Plan. Please see our enclosed approval. The Helix School District No. 1-R is responsible for complying with requirements of other federal laws and applicable Oregon Department of Environmental Quality (ODEQ) requirements under the Oregon State law.

If you have any questions, please contact Mr. Daniel Duncan, Regional PCB Program Coordinator, at (206) 553-6693 or by e-mail duncan.daniel@epa.gov. If you have any questions on PCB sampling methods, please contact Mr. Don Matheny, Quality Assurance Team, Office of Environmental Assessment at (206) 553-2599.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

Encl: as

cc: Mr Randy Hinrichsen: WESD

Helix School District No. 1-R: Helix School, Ione, Oregon: PCB Remediation Plan Approval:
August 2009:.

As stated in your plan, the Helix School District No. 1-R has agreed to perform the following actions:

1. The Helix School District No. 1-R will complete the following by September 30, 2009:

- a. The complete characterization of the Helix School in accordance with 40 CFR Part 761, Subpart N: Site Characterization Sampling for PCB remediation Waste under 40 CFR § 761.61(a)(2).
- b. The removal of all PCB waste from the Helix School to a PCB concentration of less than or equal to 1 part per million (ppm).
- c. The disposal/incineration of all PCB remediation waste, from the Helix School with a PCB concentration of < 50 ppm in accordance with 40 CFR § 761.61(a)(4)(B)(2)(ii) and 40 CFR § 761.61(a)(5)(v)(A), in a state regulated municipal waste landfill, a RCRA Subtitle C landfill, a non-hazardous non-municipal waste landfill subject to the requirements of 40 CFR § 257.5 through 257.30, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).
- d. The disposal/incineration of all PCB remediation waste, from the Helix School with a PCB concentration of ≥ 50 ppm in accordance with 40 CFR § 761.61(a)(4)(B)(2)(iii), in a state regulated hazardous waste landfill permitted by EPA under section 3004 of RCRA, or permitted by a state under section 3006 of RCRA, or in a chemical waste landfill or at an incinerator approved by the EPA to accept PCB waste subject to the Toxic Substances Control Act (TSCA).
- e. The disposal/incineration of all PCB bulk product waste from the Helix School accordance with 40 CFR §§ 761.62(a)(1) - (7).
- f. Provide copies of Certificates of Disposal for the disposal of the PCB wastes.
- g. Provide copies of Certificates of Destruction for the incineration of the PCB wastes.
- h. The identification on all appropriate facility drawings from the Helix School site of the existence of TSCA regulated PCB waste and contamination, if any, that is left in place at the Helix School. This identification should indicate the need for additional precautions during future modification, renovation, or demolition of the facility.

- i. Perform the required PCB verification sampling in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii).
 - j. Perform the required PCB verification sampling analysis using PCB Methods 3500B/3540C or Method 3500B/3500B and the chemical analyses by EPA Method 8082 in accordance with 40 CFR § 761.61(a)(5)(iv) and 40 CFR § 761.292 (Subpart O).
 - k. Retain the records required under 40 CFR §§ 761.125(e)(5)(i)-(iv) and 40 CFR §§ 761.61(a)(3) - (a)(5).
2. The Helix School District No. 1-R will provide to EPA Region 10 and the Oregon Department of Environmental Quality (ODEQ) a final report documenting the completion of the above items. This report will be provided no later September 30, 2009, for the PCB remediation. This report will also include:
- a. The results of the removal of all PCBs to less than 1 ppm PCBs.
 - b. Information on additional pre- and post-cleanup sampling as well as the estimated cost of the cleanup by man-hours and dollars in accordance with 40 CFR §§ 761.61(a)(6)(i)-(ii) and 40 CFR § 761.61(a)(9) and 40 CFR §§ 761.125(c)(5)(i-ix). Although not required for compliance with the PCB Spill Cleanup Policy at 40 CFR § 761.125 (c)(5), this information should also be maintained by the Ione School District as well as the ODEQ.
 - c. The number of acres remediated under the PCB Remediation Plan in accordance with 40 CFR § 761.61(a).

If you have any questions, please contact Mr. Daniel Duncan, Regional PCB Program Coordinator, at telephone (206) 553-6693; duncan.daniel@epa.gov. If you have any questions on PCB sampling methods, please contact Mr. Don Matheny, Quality Assurance Team, Office of Environmental Assessment at (206) 553-2599.

Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

Encl: as

cc: Mr. Randy Hinrichsen – WESD

Mr. Randy Hinrichsen, Project Manager
Willamette Education Service District
2611 Pringle Road SE
Salem, Oregon 97302

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CONCURRENCES			
Initials:			
Name:	Daniel Duncan		
Date:			